

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION

No. 3:16-md-02738-MAS-RLS

**DECLARATION OF JESSICA DAVIDSON IN SUPPORT OF
DEFENDANTS JOHNSON & JOHNSON AND LLT MANAGEMENT,
LLC'S MEMORANDUM OF LAW IN SUPPORT OF MOTION TO
EXCLUDE PLAINTIFFS' EXPERTS' OPINIONS REGARDING
BIOLOGICAL PLAUSIBILITY/MECHANISM**

I, Jessica Davidson, declare as follows:

I am an attorney and a partner with the law firm Skadden, Arps, Slate, Meagher & Flom LLP, counsel for Defendants Johnson & Johnson and LLT Management, LLC (hereafter, "Defendants") in the above-captioned matter. The facts stated in this Declaration are true of my own personal knowledge. I submit this Declaration in Support of Defendants' Memorandum of Law in Support of Motion to Exclude Plaintiffs' Experts' Opinions Regarding Biological Plausibility/Mechanism.

1. Attached hereto collectively as **Exhibit 1** are true and correct copies of produced documents prefixed "SAED_SEPT222021_SUPPL_".

2. Attached hereto as **Exhibit 2** is a true and correct copy of Wentzensen & O'Brien, *Talc, Body Powder, and Ovarian Cancer: A Summary of the Epidemiologic Evidence* 163(1) Gynecol. Oncol. 199 (2021).
3. Attached hereto as **Exhibit 3** is a true and correct copy of the Third Amended Report of Rebecca Smith-Bindman, May 28, 2024, in this case.
4. Attached hereto as **Exhibit 4** is a true and correct copy of the Third Amended Report of Judith Wolf, May 28, 2024, in this case.
5. Attached hereto as **Exhibit 5** is a true and correct copy of the transcript of the deposition of Patricia G. Moorman, February 13, 2024, in this case.
6. Attached hereto as **Exhibit 6** is a true and correct copy of Karnezis, *The Disparate Origins of Ovarian Cancers: Pathogenesis & Prevention Strategies*, 17(1) Nat. Rev. Cancer 65 (2017).
7. Attached hereto as **Exhibit 7** is a true and correct copy of Reid, *Epidemiology of Ovarian Cancer: A Review*, 14(1) Cancer Biol. Med. 9 (2017).
8. Attached hereto as **Exhibit 8** is a true and correct copy of Collaborative Group on Epidemiological Studies of Ovarian Cancer, *Ovarian Cancer and Smoking: Individual Participant Meta-Analysis Including 28,114 Women With Ovarian Cancer From 51 Epidemiological Studies*, 13(9) Lancet Oncology 946 (2012).
9. Attached hereto as **Exhibit 9** is a true and correct copy of the transcript of the deposition of Rebecca Smith-Bindman, October 1, 2021, in this case.

10. Attached hereto as **Exhibit 10** is a true and correct copy of the transcript of the deposition of Sonal Singh, April 4, 2024, in this case.
11. Attached hereto as **Exhibit 11** is a true and correct copy of the Second Amended Report of Shawn Levy, May 28, 2024, in this case.
12. Attached hereto as **Exhibit 12** is a true and correct copy of the Report of Sarah E. Kane, November 15, 2018, in this case.
13. Attached hereto as **Exhibit 13** is a true and correct copy of the Third Amended Report of Anne McTiernan, May 28, 2024, in this case.
14. Attached hereto as **Exhibit 14** is a true and correct copy of the Second Amended Report of Judith Wolf, May 28, 2024, in *Judkins v. Johnson & Johnson*.
15. Attached hereto as **Exhibit 15** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson, May 28, 2024, in *Rausa v. Johnson & Johnson*.
16. Attached hereto as **Exhibit 16** is a true and correct copy of the Second Amended Report of Judith Wolf, May 28, 2024, in *Gallardo v. Johnson & Johnson*.
17. Attached hereto as **Exhibit 17** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson, May 28, 2024, in *Newsome v. Johnson & Johnson*.
18. Attached hereto as **Exhibit 18** is a true and correct copy of the Second Amended Report of Judith Wolf, May 28, 2024, in *Bondurant v. Johnson & Johnson*.

19. Attached hereto as **Exhibit 19** is a true and correct copy of the Second Amended Report of Daniel L. Clarke-Pearson, May 28, 2024, in *Converse v. Johnson & Johnson*.
20. Attached hereto as **Exhibit 20** is a true and correct copy of Harper, *Talcum Powder Induces Malignant Transformation in Normal Human Primary Ovarian Epithelial Cells*, 75(2) Minerva Obstet. Gynecol. 150 (2023).
21. Attached hereto as **Exhibit 21** is a true and correct copy of the Third Amended Report of Daniel L. Clarke-Pearson, May 28, 2024, in this case.
22. Attached hereto as **Exhibit 22** is a true and correct copy of the Supplemental Report of Sonal Singh, November 15, 2023, in this case.
23. Attached hereto as **Exhibit 23** is a true and correct copy of Mandarino, *The Effect of Talc Particles on Phagocytes in Co-Culture With Ovarian Cancer Cells*, 180 Environ. Res. 108676 (2020).
24. Attached hereto as **Exhibit 24** is a true and correct copy of the Amended Report of Michele L. Cote, May 28, 2024, in this case.
25. Attached hereto as **Exhibit 25** is a true and correct copy of the Third Amended Report of Laura M. Plunkett, May 28, 2024, in this case.
26. Attached hereto as **Exhibit 26** is a true and correct copy of Egli & Newton, *The Transport of Carbon Particles in the Human Reproductive Tract*, 12(2) Fertil. Steril. 151 (1961).

27. Attached hereto as **Exhibit 27** is a true and correct copy of the transcript of the deposition of Michele L. Cote, March 21, 2024, in this case.
28. Attached hereto as **Exhibit 28** is a true and correct copy of the Report of Arch Carson, November 16, 2018, in this case.
29. Attached hereto as **Exhibit 29** is a true and correct copy of Venter & Iturralde, *Migration of a Particulate Radioactive Tracer From the Vagina to the Peritoneal Cavity and Ovaries*, 55(23) S. Afr. Med. J. 917 (1979).
30. Attached hereto as **Exhibit 30** is a true and correct copy of Kunz, *The Uterine Peristaltic Pump: Normal and Impeded Sperm Transport Within the Female Genital Tract*, in *The Fate of the Male Germ Cell* 267 (Ivell & Holstein eds. 1997).
31. Attached hereto as **Exhibit 31** is a true and correct copy of Blumenkrantz, *Retrograde Menstruation in Women Undergoing Chronic Peritoneal Dialysis*, 57(5) Obstet. Gynecol. 667 (1981).
32. Attached hereto as **Exhibit 32** is a true and correct copy of Halme, *Retrograde Menstruation in Healthy Women and in Patients With Endometriosis*, 64(2) Obstet. Gynecol. 151 (1984).
33. Attached hereto as **Exhibit 33** is a true and correct copy of de Boer, *Transport of Particulate Matter Through the Human Female Genital Tract*, 28(2) J. Reprod. Infertil. 295 (1972).

34. Attached hereto as **Exhibit 34** is a true and correct copy of Sjösten, *Retrograde Migration of Glove Powder in the Human Female Genital Tract*, 19(4) Hum. Reprod. 991 (2004).

35. Attached hereto as **Exhibit 35** is a true and correct copy of Keskin, *Does Long-Term Talc Exposure Have a Carcinogenic Effect on the Female Genital System of Rats? An Experimental Pilot Study*, 280 Arch. Gynecol. Obstet. 925 (2009).

36. Attached hereto as **Exhibit 36** is a true and correct copy of Henderson, *The Demonstration of the Migration of Talc From the Vagina and Posterior Uterus to the Ovary in the Rat*, 40(2) Environ. Res. 247 (1986).

37. Attached hereto as **Exhibit 37** is a true and correct copy of Wehner, *On Talc Translocation From the Vagina to the Oviducts and Beyond*, 24(4) Food Chem. Toxicol. 329 (1986).

38. Attached hereto as **Exhibit 38** is a true and correct copy of Wehner, *Do Particles Translocate From the Vagina to the Oviducts and Beyond*, 23(3) Food Chem. Toxicol. 367 (1985).

39. Attached hereto as **Exhibit 39** is a true and correct copy of the Report of Sonal Singh, November 16, 2018, in this case.

40. Attached hereto as **Exhibit 40** is a true and correct copy of the transcript of the deposition of Sonal Singh, January 16, 2019, in this case.

41. Attached hereto as **Exhibit 41** is a true and correct copy of Henderson, *Talc and Carcinoma of the Ovary and Cervix*, 78(3) J. Obstet. Gyn. Br. Comm. 266 (1971).

42. Attached hereto as **Exhibit 42** is a true and correct copy of the Report of Ellen Blair Smith, November 16, 2018, in this case.

43. Attached hereto as **Exhibit 43** is a true and correct copy of Heller, *The Relationship Between Perineal Cosmetic Talc Usage and Ovarian Talc Particle Burden*, 174(5) Am. J. Obstet. Gynecol. 1507 (1996) .

44. Attached hereto as **Exhibit 44** is a true and correct copy of McDonald, *Correlative Polarizing Light and Scanning Electron Microscopy for the Assessment of Talc in Pelvic Region Lymph Nodes*, 43(1) Ultrastruct. Pathol. 13 (2019).

45. Attached hereto as **Exhibit 45** is a true and correct copy of McDonald, *Migration of Talc From the Perineum to Multiple Pelvic Organ Sites: Five Case Studies With Correlative Light and Scanning Electron Microscopy*, 152(5) Am. J. Clin. Pathol. 590 (2019).

46. Attached hereto as **Exhibit 46** is a true and correct copy of the Report of Bernard L. Harlow, November 15, 2023, in this case.

47. Attached hereto as **Exhibit 47** is a true and correct copy of Johnson, *Analytic Composition of Talc in Commercially Available Baby Powder and in Pelvic Tissues Resected From Ovarian Carcinoma Patients*, 159(2) Gynecol. Oncol. 527 (2020).

48. Attached hereto as **Exhibit 48** is a true and correct copy of the Report of Patricia G. Moorman, November 16, 2018, in this case.

49. Attached hereto as **Exhibit 49** is a true and correct copy of the transcript of the deposition of Patricia G. Moorman, January 25, 2019, in this case.

50. Attached hereto as **Exhibit 50** is a true and correct copy of Cramer, *Presence of Talc in Pelvic Lymph Nodes of a Woman With Ovarian Cancer and Long-Term Genital Exposure to Cosmetic Talc*, 110(2) Obstet. Gynecol. 498 (2007).

51. Attached hereto as **Exhibit 51** is a true and correct copy of Suzuki & Kohyama, *Translocation of Inhaled Asbestos Fibers From the Lungs to Other Tissues*, 19(6) Am. J. Ind. Med. 701 (1991).

52. Attached hereto as **Exhibit 52** is a true and correct copy of the Third Amended Report of Jack Siemiatycki, May 27, 2024, in this case.

53. Attached hereto as **Exhibit 53** is a true and correct copy of the transcript of the deposition of Bernard L. Harlow, April 9, 2024, in this case.

54. Attached hereto as **Exhibit 54** is a true and correct copy of National Toxicology Program, *Toxicology and Carcinogenesis Studies of Talc (CAS No. 14807-96-6) in F344/N Rats and B6C3F1 Mice (Inhalation Studies)* (1993).

55. Attached hereto as **Exhibit 55** is a true and correct copy of a Letter from Steven M. Musser, Ph.D., Deputy Director for Scientific Operations, Center for

Food Safety & Applied Nutrition, to Samuel S. Epstein, M.D., Cancer Prevention Coalition, University of Illinois – Chicago School of Public Health (April 1, 2014).

56. Attached hereto as **Exhibit 56** is a true and correct copy of Research Committee of the British Thoracic Association and The Medical Research Council Pneumoconiosis Unit, *A Survey of the Long-Term Effects of Talc and Kaolin Pleurodesis*, 73 Br. J. Dis. Chest 285 (1979).

57. Attached hereto as **Exhibit 57** is a true and correct copy of Fletcher, *Molecular Basis Supporting the Association of Talcum Powder Use With Increased Risk of Ovarian Cancer*, 26(12) Reprod. Sci. 1603 (2019).

58. Attached hereto as **Exhibit 58** is a true and correct copy of the transcript of the deposition of Ghassan Saed, January 23, 2019, in this case.

59. Attached hereto as **Exhibit 59** is a true and correct copy of Shukla, *Alterations in Gene Expression in Human Mesothelial Cells Correlate with Mineral Pathogenicity*, 41(1) Am. J. Respir. Cell Mol. Biol. 114 (2009).

60. Attached hereto as **Exhibit 60** is a true and correct copy of Hillegass, *Utilization of Gene Profiling and Proteomics to Determine Mineral Pathogenicity in a Human Mesothelial Cell Line (LP9/TERT-1)*, 73(5-6) J. Toxicol. Environ. Health 423 (2010).

61. Attached hereto as **Exhibit 61** is a true and correct copy of Malmberg, *Serous Tubal Epithelial Carcinoma, Chronic Fallopian Tube Injury, and Serous Carcinoma Development*, 468(6) Virchows Arch. 707(2016).
62. Attached hereto as **Exhibit 62** is a true and correct copy of the Report of Ie-Ming Shih, February 25, 2019, in this case.
63. Attached hereto as **Exhibit 63** is a true and correct copy of Ness & Cottreau, *Possible Role of Ovarian Epithelial Inflammation in Ovarian Cancer*, 91(17) J. Nat'l Cancer Inst. 1459 (1999).
64. Attached hereto as **Exhibit 64** is a true and correct copy of Balkwill & Mantovani, *Inflammation and Cancer: Back to Virchow?*, 357(9255) Lancet 539 (2001).
65. Attached hereto as **Exhibit 65** is a true and correct copy of Buz'Zard & Lau, *Pycnogenol® Reduces Talc-Induced Neoplastic Transformation in Human Ovarian Cell Cultures*, 21(6) Physiotherapy Research 579 (2007).
66. Attached hereto as **Exhibit 66** is a true and correct copy of Trabert, *Pre-Diagnostic Serum Levels of Inflammation Markers and Risk of Ovarian Cancer in the Prostate, Lung, Colorectal and Ovarian Cancer (PLCO) Screening Trial*, 135(2) Gynecol. Oncol. 297 (2014).

67. Attached hereto as **Exhibit 67** is a true and correct copy of Phung, *Effects of Risk Factors for Ovarian Cancer in Women With and Without Endometriosis*, 118(5) Fertil. Steril. 960 (2022).

68. Attached hereto as **Exhibit 68** is a true and correct copy of Trabert, *Analgesic Use and Ovarian Cancer Risk: An Analysis in the Ovarian Cancer Cohort Consortium*, 111(2) J. Nat'l Cancer Inst. 137 (2019) .

69. Attached hereto as **Exhibit 69** is a true and correct copy of Trabert, *Aspirin, Nonaspirin Nonsteroidal Anti-Inflammatory Drug, and Acetaminophen Use and Risk of Invasive Epithelial Ovarian Cancer: A Pooled Analysis in the Ovarian Cancer Association Consortium*, 106(2) J. Nat'l Cancer Inst. 1 (2014).

70. Attached hereto as **Exhibit 70** is a true and correct copy of Hurwitz, *Association of Frequent Aspirin Use with Ovarian Cancer Risk According to Genetic Susceptibility*, 6(2) JAMA Network Open e230666 (2023).

71. Attached hereto as **Exhibit 71** is a true and correct copy of Baandrup, *Nonsteroidal Anti-Inflammatory Drugs and Risk of Ovarian Cancer: Systematic Review and Meta-Analysis of Observational Studies*, 92(3) Acta. Obstet. Gynecol. Scand. 245 (2013).

72. Attached hereto as **Exhibit 72** is a true and correct copy of Ni, *Meta-Analysis on the Associations Between Non-Steroidal Anti-Inflammatory Drug Use and Ovarian Cancer*, 75(1) Br. J. Clin. Pharmacol. 26 (2012).

73. Attached hereto as **Exhibit 73** is a true and correct copy of the transcript of the deposition of Daniel L. Clarke-Pearson, January 17, 2024, in this case.

74. Attached hereto as **Exhibit 74** is a true and correct copy of the transcript of the deposition of Ghassan Saed, February 14, 2019, in this case.

75. Attached hereto as **Exhibit 75** is a true and correct copy of Emi, *Transcriptomic and Epigenomic Effects of Insoluble Particles on J774 Macrophages*, 16(10) Epigenetics 1053 (2021).

76. Attached hereto as **Exhibit 76** is a true and correct copy of the transcript of the deposition of Laura M. Plunkett, August 10, 2021, in this case.

77. Attached hereto as **Exhibit 77** is a true and correct copy of the transcript of the deposition of Rebecca Smith-Bindman, March 20, 2024, in this case.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: July 23, 2024



Jessica Davidson